

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

RICHARD C. HUNT,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C. A. No. 06-324-KAJ
	)	
BRIAN EMIG,	)	JURY TRIAL REQUESTED
	)	
Defendant.	)	

**DEFENDANT’S INITIAL DISCLOSURES**  
**PURSUANT TO FED. R. CIV. P. 26(a)**

Pursuant to Fed. R. Civ. P. 26(a), the Defendant Officer Brian Emig (“Defendant”) hereby provides Plaintiff with the following information:

(a) Individuals likely to have knowledge of discoverable information that may be used to support State Defendants’ defenses:

- 1) Brian Emig, Howard R. Young Correctional Institution, 1301 E. 12<sup>th</sup> Street, Wilmington, DE 19809.
- 2) Nurse Carmen Davis, Baylor Women’s Correctional Institution, 660 Baylor Boulevard, New Castle, DE 19720.

(b) Documents that may be used to support Defendant’s defenses:

All Department of Correction and institutional files relating to the incidents which form the basis of the Complaint.

(c) Experts and their opinions:

Defendant has not yet retained any experts, but reserves the right to do so, and will supplement this response as required by Rule 26(a).

(d) Insurance agreements in force:

Not applicable. Defendant further discloses that no such insurance exists.

(e) Basis for any damages claimed:

Not applicable.

Defendant reserves the right to supplement these disclosures.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Eileen Kelly  
Eileen Kelly, I.D. #2884  
Deputy Attorney General  
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Attorney for Defendant

Date: October 30, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2006, I electronically filed *Defendant's Initial Disclosures* with the Clerk of Court using CM/ECF. I hereby certify that on October 30, 2006, I have mailed by United States Postal Service, the document to the following non-registered party: Richard Hunt.

/s/ Eileen Kelly  
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